

Exhibit 15

KINNE IP GROUP

Intellectual Property Law

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May 27, 2008

Via Federal Express

Richard T. McCaulley, Jr., Esq.
Sidley Austin LLP
1 South Dearborn St.
Chicago, IL 60603

Re: Huntair, Inc. v. ClimateCraft, Inc., C.A. No. 07 C 6890

Dear Rick:

As we discussed, the Court requires the parties to exchange their respective claim terms for construction and the proposed jury instruction the party would have the Court give. You asked that we extend the May 22 deadline until today, and I agreed.

ClimateCraft contends that some of the terms in the patent claims are not amendable to construction and insolubly ambiguous. For some of these, no jury instruction is offered, although ClimateCraft reserves the right to offer one in response to Huntair's position and as discovery progresses. For others, proposed jury instructions are offered in the alternative, should the Court decline to find the claim term indefinite. Thus, terms including, but not limited to, "fan array," "array controller for controlling ... fan units to run at substantially peak efficiency by strategically turning selective ones of said ... fan units on and off," "peak efficiency," "substantially peak efficiency," "reduced efficiency," "strategically," "peak efficiency operating range," "a control system for operating said plurality of fan units at substantially peak efficiency," "programmable array controller," and "acoustically absorptive insulation surface" may be indefinite.

The following are ClimateCraft's initial, proposed terms for construction and corresponding, proposed jury instructions.

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“fan array” – two or more fan units positioned to work together in parallel

“array controller” – an control mechanism operating an array

“programmable array controller” - an array controller having a computer that can be programmed to provide an automatic control mechanism operating an array to achieve a desired result

“air handling compartment” – a portion of an air handler or air handling system

“air handler” or “air handling system” - a system having components designed to work together to condition air as part of the primary system for ventilation of structures

“peak efficiency” – the maximum achievable static efficiency for a fan unit

“airway path” - the combined discharge plenum and inlet plenum

“fan array configuration” - the pattern created by the fan units in a fan array

“fan unit chamber” - a housing containing a fan unit

“air relief passage therebelow” - space provided below a fan unit within a fan unit chamber

“grid system” - system providing a framework for installation of fan units

“fan wheel diameter” – the distance from one side of the outer periphery of a fan wheel to the opposite side of the outer periphery of the fan wheel

“backdraft dampeners” - apparatus that blocks airflow through a fan unit when the fan unit is turned off to prevent reverse air flow through that fan unit

“an array controller for controlling said at least six fan units to run at substantially peak efficiency by strategically turning selective ones of said at least six fan units on and off” – for use with at least six fan units, a control mechanism controlling the fan units to run at substantially peak efficiency by (a) automatically determining whether at least one, but not all, of the fan units should be turned off and the remaining fan units should be run at substantially peak efficiency, (b) automatically turning off the at least one fan unit in accordance with the determination made above and (c) automatically running the remaining fan units at substantially peak efficiency.

“a control system for operating said plurality of fan units at substantially peak efficiency by strategically turning on and off selective ones of said plurality of fan units” – a control system operating the fan units to run at substantially peak efficiency by (a) automatically determining whether at least one, but not all, of the fan units should be turned off and the remaining fan units should be run at substantially peak efficiency, (b)

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automatically turning off the at least one fan unit in accordance with the determination made above and (c) automatically running the remaining fan units at substantially peak efficiency.

“a control system for controlling said plurality of fan units, said control system allowing control of the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency” – a control system controlling the fan units and permitting operation of the fan units at substantially peak efficiency by permitting an unspecified component, which may be the control system, to (a) automatically determine whether at least one, but not all, of the fan units should have its speed reduced and the remaining fan units should be run at a greater speed to run at substantially peak efficiency, (b) automatically reducing the speed of the at least one fan unit in accordance with the determination made above and (c) automatically running the remaining fan units at a greater speed to run at substantially peak efficiency.

“a control system for controlling the speed of the fan units in said plurality of fan units such that they run at substantially peak efficiency” – a control system controlling the fan units to run at substantially peak efficiency by (a) automatically determining whether at least one, but not all, of the fan units should have its speed reduced and the remaining fan units should be run at a greater speed to run at substantially peak efficiency, (b) automatically reducing the speed of the at least one fan unit in accordance with the determination made above and (c) automatically running the remaining fan units at a greater speed to run at substantially peak efficiency.

ClimateCraft further reserves the right to offer proposed jury instructions and contentions to the Court regarding other claim terms, as necessary, after receiving Huntair’s proposed terms for construction and as discovery progresses overall.

We look forward to reviewing Huntair’s claim terms and contentions and working with you in an effort to reach agreement, where possible, on as many terms as possible.

Respectfully yours,



Charles C. Kinne

CCK/pc